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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**THOMAS GLENN and PATSY
McKINNEY,**

11-CV-402-KI

PLAINTIFFS,

v.

CITY OF PORTLAND, a public body,

DEFENDANT.

**DECLARATION OF DEREK REINKE (IN
SUPPORT OF DEFENDANT'S
RESPONSE TO MEMORANDUM OF
LAW IN SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

I, DEREK REINKE, declare as follows:

1. I am a Senior Management Analyst with the City of Portland's Independent Police Review ("IPR") Division, which is part of the City's Office of City Auditor. I have held this position since January 2007.

2. I received a Master of Science Degree in Psychology with a focus on Statistics and Research Design in 2001 from Utah State University. I received a Bachelor of Science Degree in Psychology in 1998 from Pacific Lutheran University. Prior to being employed by the City of Portland, I was employed by the State of Oregon's Department of Consumer and

Business Services as a Senior Research Analyst.

3. I am familiar with a document entitled “Open and Closed Cases Associated with a Specific Allegation between January 1, 2004 to December 31, 2008.” I have recently reviewed this document. (“Open and Closed Cases Document”)

4. Between October 7, 2011 and October 13, 2011, in response to a request from Cheryl Noll of the City Attorney’s Office, I searched IPR’s database (AIM) for the following allegations in the AIM Allegations fields opened from 2004 to 2008: Improper S and/or S, Threat to unlawfully enter, Unlawful entry, Warrantless S and/or S, Warrantless S and/or S-dwelling, Warrantless S and/or S-other, Warrantless Sand/or S-person, and Warrantless S and/or S-vehicle. The term “S and/or S” means “search and/or seizure.” The IPR complaint of Thomas Glenn, IPR Case No. 2008-C-0317, appears under the allegation search term “Warrantless S and/or S –dwelling.”

5. I created the Open and Closed Cases Document referenced above in paragraph 3 by using an existing automated program that linked findings to allegations.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge.

DATED: January 9, 2012.

/s/ Derek Reinke
DEREK REINKE

Dated: January 9, 2012